

AO 91 (Rev. 08/09) Criminal Complaint

**UNITED STATES DISTRICT COURT**  
for the  
District of South Carolina

United States of America  
v.  
Romeo Rodolfo LUCH Chunchun, a.k.a Romeo  
Luch Chunchun

Case No. 2:24-mj-00018

\_\_\_\_\_  
*Defendant(s)*

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 12, 2020 in the county of Charleston in the  
District of South Carolina, the defendant(s) violated:

*Code Section*

Title 8, United States Code, Section  
1326(a).

*Offense Description*

Did knowingly and unlawfully enter and was found in the United States of America, not having obtained the express consent of the Attorney General or Secretary of Homeland Security to reapply for admission thereto; said defendant then being an alien who had been previously deported from the United States to Guatemala on December 12, 2012.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.

  
Complainant's signature

Bradley Long, Deportation Officer  
Printed name and title

Sworn to before me and signed in my presence.

Date: June 5, 2024



  
Judge's signature

City and state: Charleston, South Carolina

Mary Gordon Baker, United States Magistrate Judge  
Printed name and title

STATE OF SOUTH CAROLINA     }  
COUNTY OF CHARLESTON     }                   AFFIDAVIT

I, Bradley Long, being first duly sworn, hereby depose and state as follows:

1. I am employed as a Deportation Officer with the Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations (ERO). I have been employed with ICE ERO since May 2009. During that time, I have received training through the ICE Basic Immigration Law Enforcement Training Program at Glynco, GA, and I have conducted investigations into both criminal and administrative matters involving violations of the United States Immigration and Nationality Act. My responsibilities include identifying and investigating illegal aliens with criminal histories that are subject to criminal prosecution, including violations of 8 U.S.C. § 1326;
2. That the information contained in this affidavit is based on my personal participation in this investigation and from information provided to me by other law enforcement officers. As this affidavit is being submitted for the limited purpose of establishing probable cause to support the arrest of Romeo Rodolfo LUCH Chunchun, aka Romeo Luch Chunchun, for violations of federal law, including, but not limited to: 8 U.S.C. § 1326(a), I have not included each and every fact known to me concerning this investigation and have set forth only those facts that I believe are necessary for said purpose;
3. On September 12, 2020, the North Charleston Police Department arrested LUCH Chunchun for Felony Driving Under the Influence Resulting in Death, Driving Under Suspension 1<sup>st</sup> offense, and Operating Uninsured. On the same date, ERO officers became aware that LUCH Chunchun was present in the United States. Copies of records from immigration file bearing control number A205 727 903 corresponding to LUCH Chunchun show that he is a native of Guatemala who has been previously deported and who is in the United States without permission;
4. On November 11, 2012, the United States Border Patrol (USBP) encountered LUCH-Chunchun at or near Hidalgo, Texas;
5. On November 12, 2012, LUCH Chunchun was served with a Notice and Order of Expedited Removal form I-860;
6. On December 12, 2012, the Order of Removal was executed, whereby LUCH Chunchun was removed from the United States to Guatemala. On that day, LUCH Chunchun surrendered his fingerprint and photo for Immigration form I-296 (Notice to Alien Ordered Removed/Departure Verification) on which he signed. LUCH Chunchun was witnessed and signed by an Immigration Officer;
7. On an Unknown Date at or near an Unknown Location, LUCH Chunchun illegally entered the United States;

8. On September 12, 2020, the North Charleston Police Department arrested LUCH Chunchun for Felony Driving Under the Influence Resulting in Death, Driving Under Suspension 1<sup>st</sup> offense, and Operating Uninsured. On the same date, ERO officers became aware that LUCH Chunchun was present in the United States;
9. A Record check in the Computer Linked Application Informational Management System (CLAIMS) revealed no record that LUCH Chunchun filed an application for permission to reapply for admission into the United States or from the Secretary of Homeland Security, for re-admission into the United States as required by law. On June 4, 2024, this was confirmed by the issuance of the certificate of nonexistence of record from the United States Citizenship and Immigration Services;
10. Based on the foregoing, I submit there is probable cause to believe that Romeo Rodolfo LUCH Chunchun, aka Romeo Luch Chunchun, is in violation of 8 U.S.C. § 1326(a), in that, on or about September 12, 2020, in the County of Charleston in the District of South Carolina, he did knowingly and unlawfully enter and/or was found in the United States of America, not having obtained the express consent of the Attorney General or Secretary of Homeland Security to reapply for admission thereto; said defendant then being an alien who previously had been deported from the United States to Guatemala, on December 12, 2012.

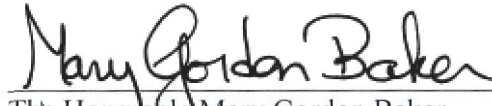
This Affidavit has been reviewed by AUSA Dean H. Secor.



Bradley Long, Deportation Officer  
United States Immigration and Customs Enforcement

SWORN TO ME VIA TELEPHONE OR  
OTHER RELIABLE ELECTRONIC MEANS  
AND SIGNED BY ME PURSUANT TO  
FED. R. CRIM. P. 4.1 AND 4(d) OR 41(d)(3),  
AS APPLICABLE.

This 5th day of June 2024  
Charleston, South Carolina



The Honorable Mary Gordon Baker  
United States Magistrate Judge